

**HILL  
RIVKINS**

**HILL RIVKINS & HAYDEN LLP**

45 Broadway, Suite 1500, New York, NY 10006-3739 Tel: (212) 669-0600

Fax: (212) 669-0698/0699

e-mail: [thefirm@hillrivkins.com](mailto:thefirm@hillrivkins.com)

Website: [www.hillrivkinslaw.com](http://www.hillrivkinslaw.com)

November 2, 2007

**Via email: [taufik@bhm-corp.com](mailto:taufik@bhm-corp.com)**

PT Peralahan Arnebatara Natuna

Bumidaya Plaza, 21<sup>st</sup> Floor

Jl. Imam Bonjol No. 61

Jakarta 10310, Indonesia

Attn: Mr. Taufik Karmadi

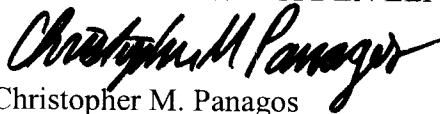
**RE: PT Jawa Tirtamarin vs.  
PT Peralahan Arnebatara Natuna**  
Southern District of New York  
Docket No.: 07 Civ 6837  
Your File: Please Advise  
Our File: 29582-JAS/CMP

Dear Mr. Karmadi:

Regarding the above matter, please see the attached Endorsed Letter from the Court dated October 31, 2007, which we are transmitting to you pursuant to the Court's instructions. We reiterate that should you seek to vacate the attachments, you must petition the Court. We further suggest that you retain New York counsel.

Very truly yours,

HILL RIVKINS & HAYDEN LLP

  
Christopher M. Panagos

cc: via ECF-Electronic Case Filing

Honorable Harold Baer, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
New York, NY 10007

NEW JERSEY  
75 North Broadway  
South Amboy, NJ 08879-1638  
Tel: (732) 838-0300 Fax: (732) 316-2365  
e-mail: [thefirm@hillrivkins.com](mailto:thefirm@hillrivkins.com)

TEXAS  
712 Main Street, Suite 1515  
Houston, TX 77002-3209  
Tel: (713) 222-1515 Fax: (713) 222-1359  
e-mail: [hillrivkintexas@hillrivkins.com](mailto:hillrivkintexas@hillrivkins.com)

CONNECTICUT  
60 Quarry Dock Road  
Branford, CT 06405-4654  
Tel: (203) 315-9274 Fax: (203) 315-9264  
e-mail: [hillrivkinsct@snet.net](mailto:hillrivkinsct@snet.net)

CALIFORNIA  
Of Counsel:  
Brown & Associates  
11140 Fair Oaks Boulevard, Suite 100  
Fair Oaks, CA 95628-5126  
Tel: (916) 859-4910 Fax: (916) 859-4911

October 23, 2007

Via facsimile: 212-805-7901

(2 pages)

Honorable Harold Baer, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
New York, NY 10007

<b>USDS SDNY</b> <b>DOCUMENT</b> <b>ELECTRONICALLY FILED</b> <b>DOC #:</b> _____ <b>DATE FILED:</b> 10/31/07
--

**RECEIVED**

OCT 23 2007

HAROLD BAER  
U.S. DISTRICT JUDGE  
S. D. N.Y.

**RE: PT JAWA TIRTAMARIN V.  
PT PERTALAHAN**  
Docket No.: 07 CV 6837  
Our File No.: 29582-JAS/CMP

Dear Judge Baer:

We are attorneys for Plaintiff with respect to the captioned matter. Following our telephone conversation today with Mr. Hanna of your chambers we write to advise the Court of the present status.

Plaintiff commenced this matter seeking to attach funds and property of the Defendant located in the Southern District pursuant to Rule B of the Supplemental Admiralty & Maritime Rules and in aid of enforcing a foreign arbitral award. Plaintiff has now attached \$905,103.73, the full amount prayed for in the Complaint. Defendant has been notified and is fully aware of the attachments and this lawsuit. In fact, it has written directly to the Court on three occasions.

Plaintiff's intention is to move for entry of default and for default judgment enforcing the abovementioned arbitration award immediately upon completion of service pursuant to Fed. R. Civ. P. Admiralty & Maritime Rule B(2)(a) and Rule 4. Plaintiff has arranged for service of process issuing from the S.D.N.Y. Clerk's Office by Federal Express pursuant to Rule 4(f)(2)(C)(ii) and Rule 4(h)(2) and by hand in accordance with the laws of Indonesia and pursuant to Rule 4(f)(2)(A) and Rule 4(h)(2). It is expected that both forms of service shall be effected within the next week.

NEW JERSEY  
175 North Broadway  
South Amboy, NJ 08879-1638  
Tel: (732) 838-0300 Fax: (732) 316-2365  
e-mail: thefirm@hillrivkins.com

TEXAS  
712 Main Street, Suite 1515  
Houston, TX 77002-3209  
Tel: (713) 222-1515 Fax: (713) 222-1359  
e-mail: hillrivkinstexas@hillrivkins.com

CONNECTICUT  
60 Quarry Dock Road  
Branford, CT 06405-4654  
Tel: (203) 315-9274 Fax: (203) 315-9264  
e-mail: hillrivkinsct@snet.net

CALIFORNIA  
Of Counsel:  
Brown & Associates  
11140 Fair Oaks Boulevard, Suite 100  
Fair Oaks, CA 95628-3126  
Tel: (916) 859-4910 Fax: (916) 859-4911

Christopher M. Panagos

via email: [taufik@bhm-corp.com](mailto:taufik@bhm-corp.com)  
Mr. Taufik Karmadi  
PT Peralahan Arnebatara Natuna  
*Defendant*

I have little or no  
 understanding of the 10/22 &  
 what I presume is your discussion  
 but the talk about the int. of Indonesia  
 and the saint Paul gives me some  
 pause - its likelihood is that Mr  
 Karmadi will have to send an  
 American lawyer to tell me on  
 charts story before I enter a  
 lawsuit or may be you can  
 inform me I don't need that  
 help but many will be sure  
 that reaches him as he goes  
 through some changes.

~~Harold Baer, Jr., U.S.D.J.~~

Date: 10/30/07

Endorsement:

I have little or no understanding of the 10/22 and 10/23 communications from what I presume is your adversary but the talk about the government of Indonesia and the government bank gives me some pause - the likelihood is that Mr. Karmadi will have to find an American lawyer to tell me his clients story before I enter a default or maybe you can convince me I don't need that help but meanwhile be sure this reaches him so he can respond with some clarity if he chooses.